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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER D.
COX IN SUPPORT OF DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC'S
ADMINISTRATIVE MOTION FOR
ORDER ESTABLISHING COMMON
FACT DISCOVERY CUT-OFF**

[PURSUANT TO L.R. 7-11 AND 7-12]

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher D. Cox, declare as follows:

2 1. I am an attorney licensed to practice law in the State of New York and admitted pro hac
3 vice in this action. I am a partner with the law firm of Kirkland & Ellis LLP, counsel of record for
4 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I make
5 this declaration of my own personal knowledge in support of Uber’s Motion for Order Establishing
6 Common Fact Discovery Cut-Off. I have knowledge of the facts set forth herein, and if called to testify
7 as a witness, could do so competently under oath.

8
9 2. Pursuant to Local Rules 7-11 and 7-12, in an effort to seek Plaintiffs’ agreement to the
10 relief sought in the above-referenced motion, counsel for Uber initiated a meet-and-confer process.

11 3. On November 5, 2025, I sent an email to MDL Plaintiffs’ counsel, including leadership,
12 requesting a meet-and-confer regarding Uber’s anticipated Motion for Order Establishing Common Fact
13 Discovery Cut-Off. On November 7, 2025, I sent a follow-up email to the same group, reiterating a request
14 for a call. Plaintiffs’ counsel responded on November 7, 2025, indicating their availability for a call on
15 November 10, 2025.

16
17 4. Following those emails, on November 10, 2025, I conferred regarding the anticipated
18 motion via Zoom with MDL Plaintiffs’ counsel Steven Cohn and Geoffrey Spaulding (both of Chaffin
19 Luhana LLP), who indicated they would follow up with Plaintiffs’ position.

20
21 5. Following the meet-and-confer by Zoom, I sent emails on November 11 and 12, 2025
22 seeking MDL Plaintiffs’ counsel’s position on the motion. In response, in an email on November 12, 2025,
23 Plaintiff’s counsel indicated that they believe setting a common discovery cut-off is premature.

24 I declare under penalty of perjury under the laws of the United States and the State of California
25 that the foregoing is true and correct.

26 Executed on November 12, 2025, in New York, New York.

27 /s/ Christopher D. Cox
28 Christopher D. Cox

E-FILING ATTESTATION

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn
Laura Vartain Horn